

## CRIMINAL COMPLAINT

United States District Court	DISTRICT of ARIZONA
United States of America v. <b>Jonathan Daniel Neri</b> DOB: 1991; United States	DOCKET NO.  MAGISTRATE'S CASE NO. <b>20-04306MJ</b>
Complaint for violation of Title 8 United States Code § 1324(a)(1)(A)(ii), 1324(a)(1)(B)(i), and 1324(a)(1)(B)(iii)	
<b>COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:</b> On or about January 28, 2020, in the District of Arizona, <b>Jonathan Daniel Neri</b> , knowing and in reckless disregard of the fact that certain illegal aliens, including David Garcia-Lopez, had come to, entered and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation and otherwise, in furtherance of such violation of law and did so for the purpose of private financial gain, and placing in jeopardy the life of any person; in violation of <b>Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(B)(i) and 1324(a)(1)(B)(iii).</b>	
<b>BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:</b> On or about January 28, 2020, in the District of Arizona (Guvo), United States Border Patrol Agents (BPA) saw a 2017 Blue Nissan sedan traveling southbound through the Village of GuVo on FR-1. The vehicle stopped at the end of FR-1, the driver got met up with two subjects who came out of a small wooden structure near a house. The driver opened the trunk and the two subjects got into the trunk. BPA saw the vehicle northbound on mile marker six and conducted a vehicle stop. The driver was identified as <b>Jonathan Daniel Neri</b> who admitted that there were two people in the trunk. BPA opened the trunk and found two illegal aliens hiding in the trunk, an adult male and an unaccompanied juvenile. The adult illegal alien was identified as David Garcia-Lopez.	
Material witness David Garcia-Lopez stated that had arranged to be smuggled into the United States for money. He said that he crossed the border illegally.	
In a post- <i>Miranda</i> statement, <b>Neri</b> said that he was instructed to pick up two illegal aliens. He was giving instructions to have the two illegal aliens get into the trunk. He said that in return for doing this, his \$1,000 USD debt was going to be wiped out. <b>Neri</b> said that he was going to drop off the two illegal aliens at a rest stop right before an immigration checkpoint.	
MATERIAL WITNESSES IN RELATION TO THE CHARGE: David Garcia-Lopez	
Detention Requested Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge. AUTHORIZED BY: AUSA JAA/tri <i>[Signature]</i>	SIGNATURE OF COMPLAINANT <i>[Signature]</i> OFFICIAL TITLE Border Patrol Agent
Sworn to before me and subscribed in my presence.	
SIGNATURE OF MAGISTRATE JUDGE <i>[Signature: Maria S. Aguilera]</i> DATE January 29, 2020	